

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Vikram Bhatia, D.D.S., et al., on behalf  
of themselves and all others similarly  
situated,

Plaintiffs,

v.

3M Company,

Defendant.

Case No. 0:16-cv-01304-DWF-DTS

**PLAINTIFFS' MOTION FOR  
FOURTH DISBURSEMENT OF  
SETTLEMENT FUNDS TO  
CLAIMANTS, PAYMENT OF  
FEES AND EXPENSES FOR THE  
CLAIMS ADMINISTRATOR,  
AND PROPOSAL FOR  
DISTRIBUTION OF REMAINING  
FUNDS**

Plaintiffs' Co-Lead Counsel respectfully move the Court to enter an Order approving the recommended awards and to order the Fourth Disbursement of Funds to Claimants, the Payment of Fees and Expenses for the Claims Administrator, and Proposal for Distribution of Remaining Funds for the amounts set forth in the lists of Awards attached to the Declarations of Justin Wind and Daniel Hedlund.

This motion is based upon the pleadings, files, and records herein, including Plaintiffs' Co-Lead Counsel's Memorandum of Law and supporting documents.

Dated: June 2, 2022

Respectfully submitted,

/s/ Daniel C. Hedlund

Daniel C. Hedlund (#258337)  
**GUSTAFSON GLUEK PLLC**  
Canadian Pacific Plaza  
120 South 6th Street, Suite 2600

Minneapolis, MN 55402  
Telephone: (612) 333-8844  
Facsimile: (612) 339-6622  
E-mail: [dhedlund@gustafsongluek.com](mailto:dhedlund@gustafsongluek.com)

Warren T. Burns (*Admitted Pro Hac Vice*)  
(TX State Bar No. 24053119)  
**BURNS CHAREST LLP**  
900 Jackson Street, Suite 500  
Dallas, TX 75202  
Telephone: (469) 904-4550  
Facsimile: (469) 444-5002  
E-mail: [wburns@burnscharest.com](mailto:wburns@burnscharest.com)

*Plaintiffs' Co-Lead Counsel*